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August 19, 2011

Response Due Date

09/23/2011

GREG SPEED, TREASURER PRIORITIES USA ACTION 1101 15TH STREET NW, 2ND FLOOR WASHINGTON, DC 20005

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IDENTIFICATION NUMBER: C00495861

REFERENCE: MID-YEAR REPORT (01/01/2011 - 06/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 3 item(s):

- 1. The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend Schedule E by providing the election designation. (11 CFR §104.3(b)(3)(vii))
- 2. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "Production Fees." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).
- **3.** Schedule B discloses an expenditure(s) for "Media Advertising Buy." The Commission notes the additional text stating "Issue Ad." However, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a